

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, INC.,

Plaintiff,

v.

AMAZON WEB SERVICES, LLC,
AMAZON.COM, INC.,
ALEXA INTERNET, INC.,
IAC SEARCH & MEDIA, INC.,
SNAP TECHNOLOGIES INC.,
YAHOO! INC.,
SMARTDEVIL INC.,
EXALEAD INC., AND
EXALEAD SA.,

Defendants.

C.A. No. 07-787-SLR

**PLAINTIFF’S REPLY TO COUNTERCLAIMS OF
DEFENDANTS AMAZON WEB SERVICES LLC,
AMAZON.COM, INC. AND ALEXA INTERNET, INC.**

Plaintiff and Counterclaim Defendant Girafa.Com, Inc. (“Girafa”) hereby replies to the Answer, Defenses and Counterclaims of Defendants and Counterclaim Plaintiffs Amazon Web Services LLC (“AWS”), Amazon.com, Inc. (“Amazon.com”) and Alexa Internet, Inc. (“Alexa”) (collectively referred to as “Amazon”) as follows:

PARTIES

2. Girafa admits the allegations in paragraph 2 of Amazon’s Counterclaims.
3. Girafa admits the allegations in paragraph 3 of Amazon’s Counterclaims.
4. Girafa admits the allegations in paragraph 4 of Amazon’s Counterclaims.

5. Girafa admits that Girafa.com Inc. has a principal place of business at 1313 N. Market Street, Suite 5100, Wilmington, Delaware 19801 and that Girafa.com Ltd. has a principal place of business at Twin Tower Two, 35 Jabotinsky Road, Suite 401, Ramat Gan, 52511, Israel.

JURISDICTION AND VENUE

- 6. Girafa admits the allegations in paragraph 6 of Amazon's Counterclaims.
- 7. Girafa admits the allegations in paragraph 7 of Amazon's Counterclaims.
- 8. Girafa admits the allegations in paragraph 8 of Amazon's Counterclaims.
- 9. Girafa admits the allegations in paragraph 9 of Amazon's Counterclaims.
- 10. Girafa admits the allegations in paragraph 10 of Amazon's Counterclaims.

COUNTERCLAIM I
(Declaration of Noninfringement)

11. Girafa restates and incorporates by reference its responses to paragraphs 2-10 of Amazon's Counterclaims as if fully set forth herein.

- 12. Girafa denies the allegations in paragraph 12 of Amazon's Counterclaims.
- 13. Girafa denies the allegations in paragraph 13 of Amazon's Counterclaims.

COUNTERCLAIM II
(Declaration of Invalidity)

14. Girafa restates and incorporates by reference its responses to paragraphs 2-13 of Amazon's Counterclaims as if fully set forth herein.

- 15. Girafa denies the allegations in paragraph 15 of Amazon's Counterclaims.
- 16. Girafa denies the allegations in paragraph 16 of Amazon's Counterclaims

RELIEF REQUESTED

Girafa denies that Amazon is entitled to any aspect of the relief it seeks.

ADDITIONAL PRAYER FOR RELIEF

WHEREFORE, in addition to its Complaint and in response to Amazon's Counterclaims, Girafa respectfully requests that:

- a. Judgment be entered declaring that each of the claims of the '904 patent is valid, enforceable and infringed;
- b. Judgment be entered that each of the counterclaims against Girafa is dismissed with prejudice;
- c. Judgment be entered awarding Girafa its costs and reasonable attorneys' fees pursuant to 35 U.S.C. §285; and
- d. The Court enter such other and further relief as the Court may deem just and proper under the circumstances.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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